

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Telecommunications Services)	CS Docket No. 95-184
Inside Wiring)	
)	
Customer Premises Equipment)	

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF AT&T CORP.

Mark C. Rosenblum
Ava B. Kleinman
Seth S. Gross

Room 3245F3
295 North Maple Ave.
Basking Ridge, NJ 07920
(908) 221-8312

Attorneys for AT&T Corp.

April 17, 1996

047

TABLE OF CONTENTS

	<u>Page</u>
SUMMARY	ii
I. LOCATE DEMARCATION POINT AT EASILY ACCESSIBLE POINT OF INTERFACE	4
II. ACCESS TO PRIVATE PROPERTY BY SERVICE PROVIDERS	8
III. MISCELLANEOUS ISSUES	12
CONCLUSION	14

SUMMARY

In its initial Comments, AT&T supported the establishment of a uniform demarcation point, for both telephony and cable, that affords competitive service providers easy and equal access to the interface with the customer. To avoid customer confusion and promote competition, AT&T urged the Commission to establish, for single family dwellings, the demarcation point just outside (but within 12 inches) of the customer's residence. The demarcation point for multiple dwelling units ("MDUs") also should be set to provide ready accessibility to competitive service providers and minimal inconvenience to consumers. AT&T thus recommended that the demarcation point for MDUs be established where the wire or cable is solely dedicated to serving a single unit. AT&T also demonstrated that the Commission has ample statutory authority to designate the demarcation point for both telephony and cable inside wiring, as well as to specify the right of customers to access and control the wiring dedicated to serving their premises. Finally, AT&T supported (1) extending all existing signal leakage rules to broadband common carrier services; (2) extending connection requirements to broadband connections; and (3) preempting state regulations that are inconsistent with the Commission's modified inside wire rules.

The comments of more than 150 parties confirm that consumers will benefit from the harmonization of telephony and cable inside wiring rules. Because those benefits will not develop for multiple dwelling units if building

owners deny access to competitive service providers, AT&T focuses these Reply Comments on the crucial issue of service provider access to customer premises.

The comments of both telephony and cable providers make clear their common desire to have access rights to customers' facilities equal to those enjoyed by the incumbent providers. To ensure that such access is minimally disruptive to the owners and residents of MDUs, AT&T continues to recommend that the demarcation point be located where the customer's serving wire or cable is separately identifiable and accessible -- at the minimum point of entry, when possible. AT&T also urges the Commission to ensure that new entrants who seek to provide their own facilities to the demarcation point are able to do so, consistent with their rights under the Telecommunications Act of 1996 (the "1996 Act"). Where competitive physical access to the demarcation point in an MDU is not practical or economically feasible, new entrants must be assured the ability to gain access to the demarcation point via the incumbent carriers' facilities, pursuant to the rights accorded to new entrants under the 1996 Act. Enforcement of these rights -- including the exercise of the Commission's preemption authority where needed -- will ensure that telephony and cable services will converge and develop, as contemplated in the NPRM, without competitive disadvantage to new entrants.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Telecommunications Services)	CS Docket No. 95-184
Inside Wiring)	
)	
Customer Premises Equipment)	

REPLY COMMENTS OF AT&T CORP.

Pursuant to the Commission's Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding,¹ AT&T Corp. ("AT&T") provides these reply comments to the Commission's proposed modifications to its inside wiring rules for telephony and cable services.

The importance and far-reach of this issue are evidenced by the more than 150 comments submitted in this proceeding.² Though the commenters focused their comments on the specific issues that were of the greatest importance to them,³ a single overarching theme did emerge – consumers will benefit if telephony and

¹ Telecommunications Services Inside Wiring Customer Premises Equipment, Notice of Proposed Rulemaking, CS Docket No. 95-184, released January 26, 1996.

² See Attachment A for a list of the commenting parties.

³ For example, building owners and managers focus their comments on the issue of provider access to private property, while local telephone companies generally limited their comments to the issues of the location of the demarcation point for telephone services, and customer access to inside wire.

cable inside wiring rules are harmonized.⁴ There is broad consensus that the demarcation points should be established so that competitive service providers have easy and equal access to the point of interface; the telephony rules governing customer access to inside wiring should be extended to cable inside wire; the Commission's cable television signal leakage rules should be extended to other broadband services using the same frequencies; and all service providers should have equal access to the customer's premises when essential to provide service. AT&T continues to support each of these objectives, but focuses these reply comments on provider access to private property. Without access to the demarcation point, identifying its location will have no practical effect.⁵ Therefore, the Commission should take the necessary steps to ensure that competitive service providers have the same access rights to the subscriber's or building owner's property as the incumbent service providers currently enjoy.

The Commission suggests that "[p]arity of access rights to private property may be a necessary predicate for any attempt to achieve parity in the rules governing cable and telephone network inside wiring, because without access to the premises, the inside wiring rules and proposals discussed in this NPRM will not

⁴ See, e.g., Ameritech, p. 5; DIRECTV, p. 1 ("cable and telephone wiring rules need to be harmonized"); ITI, p. 3; NYNEX, pp. 6-8, 9-17; RTE, p. 2; Telecommunications Industry Association, p. 3; U S WEST, pp. 3, 4.

⁵ CATA notes (pp. 8-9) that the right to gain access to a multiple dwelling unit ("MDU") is the "root of the problem."

even be implicated."⁶ AT&T agrees with the Commission that this issue is of utmost importance to all parties, because "[c]ompetition will be slow to develop, if it develops at all, if building owners freely allow incumbent service providers access to wiring but deny access to new entrants or charge new entrants for access rights given to incumbents for no charge."⁷ However, the desire for vigorous competition reflected in the comments of both cable and telephone service providers⁸ is tempered by the legitimate concerns of building owners and managers for maintaining the appearance and safety of their buildings.⁹ Because these two goals are not mutually independent, the Commission can, and should, adopt procedures that both allow for competition between service providers and protect owners' property rights.

Drawing from the comments in this proceeding, the Commission can craft rules and policies to ensure that all providers have equal access to the customer's premises. These goals can be achieved if: (1) the demarcation point for telephony is located at the minimum point of entry for MDUs; and (2) competitive service providers are accorded equal, nondiscriminatory access to the owner's property, including both the right to build facilities and, where it is impractical for new

⁶ NPRM at para. 61.

⁷ MFS, p. 3; see also Pacific Bell, p. 15 (broad rights of access will foster competition in the broadband marketplace).

⁸ See, e.g., MFS, p. 2; Multimedia Development Corp., p. 2; NYNEX, p. 2.

⁹ See, e.g., Faison, p. 2; Keystone Realty, p. 1; O'Connor, p. 2.

entrants to build their own facilities to the owner's premises, the right to use the existing service provider's facilities, upon payment to the incumbent provider of cost-based and competitively neutral charges.

I. LOCATE DEMARCATION POINT AT EASILY ACCESSIBLE POINT OF INTERFACE.

Many commenters, including both LECs and building owners, support the establishment of uniform demarcation rules for telephony and cable (regardless of the technical characteristics of the medium) that afford competitive service providers easy -- and equal -- access to the point of interface.¹⁰ There is no practical reason to create different demarcation points based on bandwidth of those services. The commenters, including LECs, overwhelmingly support a common demarcation point outside a single dwelling unit ("SDU"), which would require a change in the existing rules for telephony providers,¹¹ but would require no change

¹⁰ See, e.g., Ameritech, p. 5 (favoring "the establishment of common rules for premises wire which would apply to both telephone companies and cable operators, regardless of the type of wire, and regardless of the type of service being provided over the wire" (citations omitted)); BICSI, p. 3 ("uniform demarcation points ultimately will benefit all parties -- tenants, building owners and service providers"); Joint Commenters, p. 37 ("it would be logical and beneficial to have a single demarcation point for both telephone and cable wiring, even without technological convergence").

¹¹ The impact on telephony inside wire would be minimal, only involving a slight modification to the existing demarcation point by moving it from inside the customer's premises to the network interface unit, which is typically located just outside the customer's premises.

to existing cable rules.¹² Because a change in service provider necessitates entry by the new provider into the customer's home to install and test the new service, competition would be inhibited if the telephony demarcation point remains inside the customer premises. A customer's natural reluctance to be subjected to the inconvenience and expense of such entry will give the incumbent provider a distinct advantage over its competitors.¹³ Customers also benefit by having the demarcation point located outside, because service providers can make repairs and test equipment without disturbing the customer.¹⁴

The majority of commenters also support a demarcation point for MDUs that provides ready accessibility by competitive service providers and minimal

¹² See, e.g., NYNEX, p. 5 ("for new single family dwellings, . . . demarcation point [should] be located about 12 inches outside the premises"); Media Access Project and Consumer Federation of America, p. 10; Ameritech, pp. 9-10 (demarcation point on the outside of the building no more than 12 inches from the point of entry). Most cable companies that provided comments did not comment on the location of the demarcation point for single dwelling units.

¹³ Cincinnati Bell Telephone Company supports (p. 2) establishing a common demarcation for all wireline communications; however, it suggests that the existing telephone demarcation point be used for single dwelling units. That would establish the common demarcation point within the customer's dwelling, which, as AT&T has noted, will disadvantage competing telephone providers. GTE also argues (p. 5) that the demarcation point should remain inside the premises, because moving it outside would give the customer access to the protector. As AT&T pointed out in its comments (p. 6 n.6), moving the demarcation point outside the premises would not require customer access to the protector. Rather, the connection between the customer's inside wire and the service provider's system would take place through a standard connection at the network interface unit itself.

¹⁴ NYNEX, pp. 5-6.; USTA, p. 4.

inconvenience to consumers.¹⁵ Both of these goals are furthered by a rule that sets demarcation at the first readily accessible point where the wire, either telephony or cable, is solely dedicated to serving a single unit.¹⁶ This location provides non-incumbent telephone service providers equal access to an individual subscriber's wires without causing disruption in the subscriber's home or the building's common areas. It also alleviates to some extent the concerns of building owners and managers, because service providers will need only very limited access to the owner's property. In many MDUs the minimum point of entry is located just inside the building in the basement. Consequently, the building owner and the tenants of the building will experience very little disruption when the building is accessed. Furthermore, because there will be no need to install multiple sets of wiring throughout the building, the appearance of the building will not be "negatively

¹⁵ See, e.g., OpTel, pp. 13-14; NYNEX, pp. 6-7; Pacific Bell, pp. 2-3; Residential Communications Network, Inc., p. 5; Riser Management Systems, p. 5; USTA, p. 3.

¹⁶ In its comments (p. 7), AT&T indicated that this point is generally a communications closet. However, AT&T now agrees with those commenters that recommend that this point be the minimum point of entry, typically located in the basement of the MDU. See, e.g., RTE Group (p. 2) stating that "the most viable solutions appears to be to place a common demarcation point at the minimum point of entry;" Bankers Trust Company (p. 3) suggesting that "[t]he demarcation point should be inside the premises, preferably at the telephone vault or frame room." The vast majority of building owners and managers that commented on this issue agree that a uniform demarcation point for commercial buildings should be inside the building, preferably at the telephone vault or frame room, and for residential buildings with a superintendent, in the building, but outside each resident's unit. See, e.g., Clinton, p. 3; Codina, p. 3; Compass, pp. 3-4.

impact[ed],"¹⁷ nor will the providers' activities increase safety concerns in the common areas used by the tenants.¹⁸

Moreover, the current telephone demarcation system -- in which demarcation requirements may differ from building to building depending upon, inter alia, the age of the building,¹⁹ the carrier's or operator's operating practices,²⁰ or the building owner's preferences,²¹ and in which demarcation points may be within or without the tenant/customer's premises²² -- creates a significant barrier to efficient

¹⁷ See, e.g., NHP Incorporated, p. 1 and Hampton Enterprises, p. 1 (expressing concern that access to MDUs will lead to the installation of many telephone lines throughout the building's common areas that will impact both the appearance and safety of the building).

¹⁸ A building's manager will more easily be able to supervise the installation and maintenance activities of a service provider when those activities take place at the minimum point of entry. Therefore, the concerns of many building owners and managers (see, for example, Clinton, p. 2) that, for safety reasons, service personnel should not be permitted to go through a building unsupervised will be alleviated. See also GTE, p. 23 (with the demarcation point at the minimum point of entry for cable services, the inconvenience placed on building owners will be reduced while allowing competing service providers the opportunity to adequately install and maintain their equipment); and MFS, p. 5 (when the point of demarcation is the minimum point of entry, providing non-discriminatory access to that terminal should not be problematic for multi-tenant property owners).

¹⁹ See 47 C.F.R. § 68.3(b).

²⁰ See id. § 68.3(b)(1).

²¹ See id. §§ 68.3, 68.3(b)(2) (if telephone carrier does not establish minimum point of entry standard operating practice, building owner may establish demarcation points).

²² See id. §§ 68.3 (b)(1)-(2) (demarcation point for any particular telephony customer may not be deeper than 12 inches inside of the customer's premises).

competition. The proposed demarcation point eliminates this uncertainty by creating a demarcation point at a defined point -- the first readily accessible point where the wire is solely dedicated to serving a single unit.²³

II. ACCESS TO PRIVATE PROPERTY BY SERVICE PROVIDERS.

The comments of both telephony and cable providers make clear their common desire to have access rights to customers' facilities equal to those enjoyed by the incumbent providers.²⁴ To the extent that new service providers seek to provide their own facilities to the demarcation point, the Telecommunications Act of 1996²⁵ establishes their right to do so, by mandating (at Section 253(a)) that "[n]o State or local statute or regulation, or other State or local legal requirement, may prohibit or have the effect of prohibiting the ability of any entity to provide any interstate or intrastate telecommunication service."

The Commission has the authority under the 1996 Act to preempt state or local legal requirements that have the effect of prohibiting carriers from

²³ At such time as both cable and telephony are served over a single wire, the demarcation point for cable will become the same as for telephony -- the minimum point of entry.

²⁴ See, e.g., GTE, p. 21; Liberty, p. 13 (the Commission should give competing cable operators the same access to MDUs as the franchised cable operator); CATA, pp. 8-9; Cox, pp. 27-28; MFS, pp. 3-10; NYNEX, pp. 12-17.

²⁵ Pub. L. No. 104-104, 110 Stat. 56, February 8, 1996 (the "1996 Act").

providing telecommunications service.²⁶ Thus, where state or local laws confer on incumbent carriers exclusive or preferential rights which have the effect of inhibiting competing carriers from providing telecommunications service, the Commission can and should preempt those inconsistent state and local laws to allow the policies and goals established in this proceeding to be achieved.²⁷

²⁶ 1996 Act, Section 253(d). As several commenters note, the laws granting access are not uniform and are often unclear. Specifically, as CATA notes (p. 9), some states have access laws, while others do not and, as NYNEX explains (pp. 12-17), the access rights it has (authority to use public rights of way and eminent domain) do not necessarily provide adequate access to private property in all situations. To the extent that competitive service providers are prevented by state or local law from having the same access as the incumbent provider, the Commission can exercise its preemption authority to nullify the offending portions of those laws. See Section 253(b) of the 1996 Act (preserving state regulations that are “necessary to . . . protect the public safety and welfare” if imposed “on a competitively neutral basis”).

²⁷ Commenters have expressed specific concern that all service providers should be accorded equal rights not only regarding physical access to the MDU, but also as to any building entry charges assessed by the building owner. See, e.g., MFS, pp. 5-6. AT&T agrees that all service providers should be assessed building entry fees equally. Several commenters also note (MFS, p. 4 and NYNEX, p. 17) that competition among service providers can be enhanced if LECs and cable service providers are precluded from entering into long-term, exclusive contracts with the owners of MDU buildings. (See also GTE which suggests (p. 22) that existing cable operators should be barred from entering into exclusive relationships in excess of 12 months; and OpTel which argues (p. 8) that any exclusive rights-of-entry agreements should be limited to a specific term and not perpetual.) MFS contends (p. 4) that when a property owner allows an incumbent service provider exclusive access to its premises, but denies new entrants the same access rights, the owner has created an exclusive easement. AT&T agrees that the creation of such exclusive property rights produces an impermissible barrier to entry, and the Commission should preempt, pursuant to Section 253(d) of the 1996 Act, the enforcement of those purported rights. Because state and local laws should prohibit discriminatory application of charges imposed on franchised service

There are many reasons why competitive physical access to the MDU may not be practical, or may not be economically efficient for a new competitor. For example, it may be difficult obtaining local franchise rights, or obtaining access to private property. In addition, where new entrants anticipate insignificant demand for service at the outset, it will not be economically feasible to construct their own facilities. Thus, new service providers must have access to the incumbent providers' rights-of-way, easements and other pathways to the customer's wiring. If access to these pathways is not available, or is offered under unreasonable or unjustly discriminatory terms, the potential for meaningful competition for telephony and cable services will be reduced. Clearly, new entrants need the ability to use portions of the incumbent's network access facilities in order to provide service for their customers. In the context of the instant NPRM, this means that new entrants must be able to gain access to the demarcation point via the incumbent LECs' rights-of-way, easements, conduits and other pathways onto the private property of MDUs.²⁸

Section 251(b)(4) of the 1996 Act imposes on all LECs "[t]he duty to afford access to the poles, ducts, conduits, and rights-of-way of such carrier to

(footnote continued from previous page)

providers, any state or local laws or regulations that allow for such practices should be subject to the Commission's preemptive authority.

²⁸ The shared use of LEC access facilities will also alleviate the concerns of several building owners and managers that placing of telecommunications providers' wires and other facilities on their private property would constitute an unconstitutional taking in violation of the Fifth Amendment. See, e.g., Joint Commenters, pp. 5-7.

competing providers of telecommunications services on rates, terms, and conditions that are [just, reasonable and nondiscriminatory].” Section 251(c)(3) imposes additional, more explicit requirements on incumbent LECs:

“to provide, to any requesting telecommunications carrier for the provision of a telecommunications service, nondiscriminatory access to network elements on an unbundled basis at any technically feasible point on rates, terms, and conditions that are just, reasonable, and nondiscriminatory An incumbent local exchange carrier shall provide such unbundled network elements in a manner that allows requesting carriers to combine such elements in order to provide such telecommunications service.”²⁹

These statutory provisions provide clear authority for the Commission to require incumbent LECs to offer new carriers the ability to share their facilities on the network side of the demarcation point. Indeed, U S WEST – which enjoys significant franchise rights as the incumbent LEC – admits (p. 7) that “[e]xisting inside building wire, to the extent owned by a LEC and part of a LEC’s network, is undoubtedly a network element subject to the Act’s provisions.” Similarly, NYNEX (p. 17) urges the Commission to “adopt rules that promote open access for alternative telephone and video service providers,” by requiring LECs to afford access to competing service providers. Such shared access – provided in a competitively neutral manner pursuant to cost-based rates – will ensure that new

²⁹ See also Section 251(c)(2) in which incumbent local exchange carriers have the duty to provide “interconnection with the local exchange carrier’s network . . . at any technically feasible point with the carrier’s network.” New Section 224(f)(1), in turn, imposes a specific duty on all “utilities” (which includes LECs) to provide nondiscriminatory access to any pole, duct, conduit, or right-of-way to any cable company or non-incumbent LEC.

entrants are able to gain a foothold in the market and increase competition, consistent with the goals of the 1996 Act.³⁰

III. MISCELLANEOUS ISSUES.

The NPRM also sought comments on several other issues, including whether (1) the customer access rules for inside wiring should be extended to cable inside wiring; and (2) the rules governing cable television signal leakage should be extended to other broadband services. Efficient competition requires that all customers have access to and control of all inside wire regardless of the service being provided and regardless of the medium used to transmit that service. This is currently done for telephony inside wire and there is no need to change these rules.³¹ The comments support extending the customer access rules, currently applicable to telephony, to cable inside wiring.³²

³⁰ The Commission has ample authority, as noted above, to preempt state or local legal requirements that have the effect of prohibiting carriers from providing telecommunications service. Thus, to the extent that state or local laws inhibit the ability of competing carriers to gain access to the LEC's facilities, the Commission can and should preempt those inconsistent state and local laws.

³¹ The vast majority of commenters support this view. See, e.g., Ameritech, p. 13; Telecommunications Industry Association, p. 5.

³² See, e.g., Ameritech, p. 13 (extending the telephone inside wire rules to cable home wiring could benefit customers by giving them more choices); Cincinnati Bell Telephone, p. 3; Consumer Electronics Manufacturers Association, p. 6; Wireless Cable Association International, Inc., p. 16.

Only cable operators argue, for obvious reasons, that customers should not have control of their inside wire. Their interest in retaining control of these facilities – and potentially the services provided over them – is plainly outweighed by the public interest goal of increasing competitive choice to subscribers.³³ Several cable companies argue that if tenants are permitted to own and control cable inside wire, the Commission will violate the Fifth Amendment takings provision.³⁴ As AT&T demonstrated in its Comments (pp. 14-18), the Commission has broad statutory authority to permit customers to acquire control over their inside wire without implicating the Takings Clause of the Fifth Amendment. There is thus ample legal authority for the Commission to establish a rebuttable presumption that, through the operation of the Commission's existing rules and state laws, all cable subscribers have acquired title to (or at a minimum access to and control over) their inside wiring.³⁵ Creation of this presumption will remove the

³³ Cox contends (pp. 19-22) that allowing customers to have control over their inside wire will "diminish the likelihood of facilities-based competition." Their argument, however, appears to be based on the unsubstantiated assumption that customers will not install the necessary inside wire to support the competitive services they desire. It is unreasonable to conclude that continued ownership of the inside wiring by the incumbent cable provider will ensure any greater flexibility or opportunity for subscribers to obtain competitive services.

³⁴ See, e.g., ICTA, pp. 11-19; NCTA, pp. 36-38; Time Warner, pp. 26-29.

³⁵ See also Ameritech, pp. 13-14.

incumbent provider as an obstacle to the subscriber's freedom to choose competitive services.³⁶

CONCLUSION

For the reasons set forth above, AT&T urges the Commission to establish uniform demarcation point rules for telephony and cable wiring. For single dwelling units, the comments strongly support the establishment of the demarcation point just outside the location where the service provider's wire or cable enters the customer's premises. The comments also support a uniform multiple dwelling unit rule that would establish the demarcation point where the customer's serving wire or cable is separately identifiable and accessible.

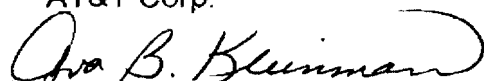
The comments also compel the Commission to ensure that competitive service providers are able to build facilities to the demarcation point, consistent with the rights accorded to competitive service providers under the 1996 Act. In addition, because in many instances it will be impractical or economically infeasible for multiple providers to build their own facilities to the owner's premises, the Commission should exercise the authority accorded to it .

³⁶ Finally, the vast majority of commenters expressing an opinion on the subject support extending the signal leakage rules to all broadband services. See, e.g., OpTel, p. 16 and Pacific Bell, p. 10. For example, Pacific Bell explains (p. 10) that these rules are necessary "given the safety hazards posed by leakage." Because the safety concerns underlying these rules implicate the provision of all broadband common carrier services -- including broadband telephony as well as cable -- they should be extended to all broadband common carrier services.

under the 1996 Act -- including the right to preempt inconsistent state and local laws and regulations -- to ensure that competitive service providers are able to obtain access to the existing service providers' network facilities to reach customers in an MDU, on a competitively neutral basis and pursuant to cost-based rates.

Respectfully submitted,

AT&T Corp.

By 
 Mark C. Rosenblum
 Ava B. Kleinman
 Seth S. Gross

Its Attorneys

Room 3245F3
 295 North Maple Avenue
 Basking Ridge, New Jersey 07920
 (908) 221-8312

April 17, 1996

APPENDIX A

NPRM CS Docket No. 95-184 Inside Wire Comments

79th Realty Company
81st Street Realty Co.
92nd Realty Co.
101 Hudson Leasing Associates
650 Fifth Avenue Company
Adelphia Communications Corporation ("Adelphia")
Adler Management Services, Inc.
AIMCO
Allen Morris Company
Ameritech
AMLI Residential Properties Trust
Anthem Equity Group, Inc.
Armiger Group
Ash Tree Apartments
AT&T Corp. ("AT&T")
Avalon Properties
Avery Construction Company
Bankers Trust Company
Beacon Centre
BellSouth Corporation and BellSouth Telecommunications, Inc. ("BellSouth")
Ben-Steele Properties
Brookfield Development, Inc.
Building Industry Consulting Service International ("BICSI")
Building Owners and Managers Association International ("BOMA");
National Realty Committee ("NRC"); National Multi Housing Council ("NMHC");
National Apartment Association ("NAA"); Institute of Real Estate Management
("IREM"); and National Association of Home Builders ("NHB")
("Joint Commenters")
Building Owners and Managers Association of Greater Miami, Inc.
Building Owners and Managers Association of Metropolitan St. Louis
Cable Telecommunications Association ("CATA")
Center Management Corporation
Cincinnati Bell Telephone Company ("CBT")
Circuit City Stores, Inc.
Clinton International Group, Inc. ("Clinton")
Codina Real Estate Management, Inc. ("Codina")
Community Housing Improvement Program, Inc.
Compaq Computer Corporation
Compass Management and Leasing, Inc. ("Compass")
Consumer Electronics Manufacturers Association ("CEMA")
Consumer Project on Technology

Continental Cablevision, Inc. and Cablevision Systems Corp. ("Joint MSOs")
Corum Real Estate Group, Inc.
Court Street East, Ltd.
Cox Communications, Inc. ("Cox")
D Squared Realty Group, Inc.
DIRECTV, Inc. ("DIRECTV")
Duke Realty Investments, Inc.
Edward J. Minskoff Equities, Inc.
Eakin & Smith, Inc.
English Village Apartments
Faison
FDC Management, Inc.
First Capital Corporation
First Capital Corporation
First Union Management, Inc.
Flournoy Properties, Inc.
Galbreath Company-Florida
Gebhart Management, Inc.
Gene B. Glick Company, Inc.
General Instrument Corporation
Georgia Apartment Association
Glenwood Management Corp.
GTE Service Corporation, on behalf of its domestic telephone companies and
GTE Media Ventures Incorporated ("GTE")
Guam Cable TV
H & M Management Company
Hampton Enterprises
Harbor Village Apartments
Harris Group
Haygood Management Company
Heartland Wireless Communications, Inc.
Host Apartments
Independent Cable & Telecommunications Association ("ICTA")
Information Technology Industry Council ("ITI")
Insignia Management Group, L.P.
IPM Real Estate Services, Inc.
Jack Resnick & Sons, Inc.
John Alden Life Insurance Company
John Hancock Mutual Life Insurance Company
Jupiter Western National, L.L.C.
Keptel
Keystone Realty Incorporated
Koll
L&B Multifamily Advisors, Inc.
Lakeside Luxury Living

Lane Company
LaSalle Partners Management Limited
LCOR Incorporated
LEDIC Management Group
Legow Management Company
Liberty Cable Company, Inc. ("Liberty")
Live Oak Properties, Ltd.
Lockwood Group
Lowe Enterprises Colorado, Inc.
Marcus Cable Co.; American Cable Entertainment; Greater Media, Inc.;
Cable Television Association of Maryland, Delaware and the District of
Columbia; Cable Television Association of Georgia; Minnesota Cable
Communications Association; New Jersey Cable Telecommunications
Association; Ohio Cable Telecommunications Association; Oregon Cable
Television Association; South Carolina Cable Television Association;
Tennessee Cable Television Association; and Texas Cable TV Association
MarRay-PCP 1500, Inc.
Massachusetts Institute of Technology
Meadow Run Apartments
Media Access Project ("MAP") and Consumer Federation of America ("CFA")
Mendik Company
Metropolitan Life Insurance Company ("MetLife")
MFS Communications Company, Inc. ("MFS")
Mid State Management Corporation
Mink & Mink, Inc.
Missouri Apartment Association
Motorola, Inc. ("Motorola")
MPMS Inc.
Multimedia Development Corp. ("MultiMedia")
MultiTechnologies Services, L.P. ("MTS")
Murray Land Clearing
ational Association of Industrial and Office Properties ("NAIOP")
National Association of Real Estate Investment Trusts® ("NAREIT")
National Cable Television Association, Inc. ("NCTA")
National Housing Partnership ("NHP")
National Private Telephone Association
New Jersey Office of the Ratepayer Advocate
New Plan Realty Trust
New York City Department of Information Technology and Telecommunications
Niles Investment Corp.
Norman Mangement Company
North Village Associates
Northern Nevada/Tahoe Chapter 89 Institute of Real Estate Management
N P Dodge Management Company, Inc.
NYNEX Telephone Companies ("NYNEX")

O'Connor Real Estate Management Company ("O'Connor")
OpTel, Inc. ("OpTel")
Orchard Development Corporation
Oxford Hill Apartments
Pacific Bell and Pacific Telesis Video Services ("Pacific")
Pacific Tower Properties
Paramount Group, Inc.
Partners Management Company
PICOR Commercial Real Estate Services
Preston Square Apartments
R&B Realty Group c/b/a R&B Cable Company
Rafanelli, Nahas and Ambrose
Real Estate Board of New York, Inc.
Residential Communications Network, Inc. ("RCN")
Riser Management Systems, L.P., Wright Runstad & Company,
and Rudin Management Company ("Riser")
Robbins Realty
Rose's Down Home Cleaning
RTE Group, Inc. ("RTE")
Santa Fe Apartments
Schuparra Properties Corporation
Sentinel Real Estate Corporation
Siecor Corporation
Silverstein Properties, Inc.
SNK Realty Group
Southern Engineering Corporation
Spokane Building Owners & Managers Association
Springfield Public Storage
State of New Jersey Board of Public Utilities
Summit Properties
Sylvan Lawrence Company, Inc.
Tandy Corporation
Tarragon Realty Advisors, Inc.
Tele-Communications, Inc. ("TCI")
Telecommunication Industry Association/User Premises
Equipment Division ("TIA/UPED")
Terry Johnson & Associates, Inc.
Thomas Group, Inc.
Timberweld Manufacturing
Time Group
Time Warner Cable and Time Warner Communications ("Time Warner")
Tishman Speyer Properties, Inc.
TKR Cable Company
Tomlinson Black Management, Inc.
Town & Country Trust

Trammell Crow Company
Tulsa Properties Management, Inc.
U S WEST, Inc. ("U S WEST")
United Dominion Realty Trust
United States Telephone Association ("USTA")
Villages of Thousand Oaks
VRS Realty Services - Florida, Inc.
Wallick Properties, Inc.
Washington Place Management
WEST GROUP, Inc.
West World Holding, Inc.
West World Management, Inc.
Wildwood Management Group
Wireless Cable Association International, Inc. ("WCIA")
Woodmont Real Estate Services
Yarmouth Group, Inc.

CERTIFICATE OF SERVICE

I, Ann Marie Abrahamson, do hereby certify that on this 17th day of April, 1996, a copy of the foregoing "Reply Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached Service List.


Ann Marie Abrahamson